

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**ALBERT SAENZ AND VERONICA
SAENZ**

Plaintiffs,

V.

**CHUBB LLOYD'S INSURANCE
COMPANY OF TEXAS, GERLOFF
COMPANY INC., ROBERT REGAN,
AND STEVE KOTARA**

Defendants.

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Civil Case No. _____


DECLARATION OF STEVE KOTARA

I, Steve Kotara, possess personal knowledge of the matters set forth herein and, if called upon as a witness in this action, could therefore testify competently thereto. Accordingly, I make this Declaration and state the following to be true and correct:

1. My name is Steve Kotara. I am over the age of eighteen (18) years of age. I have never been convicted of a felony and am fully competent to testify to the matters asserted herein. I am a senior construction estimator with Gerloff Company Inc. ("Gerloff"), an independent construction and property consulting firm. I have knowledge of and I am familiar with the facts set forth herein. All facts stated herein are true and correct and based upon my personal knowledge.
2. On or about April 12, 2016, Gerloff was engaged on behalf of Chubb Lloyd's Insurance Company of Texas ("Chubb Lloyds") in order to prepare a scope and cost estimate for alleged damages to the property owned by Albert Saenz and Veronica Saenz. I, Steve Kotara, a senior construction estimator with Gerloff, was assigned by Gerloff to inspect and prepare the scope and cost estimate for the property. I inspected the property on or about May 31, 2016, and subsequently prepared scope and estimate reports for use by Chubb Lloyd's.
3. Neither I nor Gerloff nor its agents or employees had any authority to adjust, deny or settle Plaintiffs' claim. Similarly, neither I nor Gerloff nor its agents or employees participated in the sale or servicing of Plaintiffs' insurance policy, made any representations to Plaintiffs regarding the coverage available under the policy, or adjusted Plaintiffs' insurance claim.
4. Gerloff's and my responsibilities were limited to inspecting the property, including taking photographs, and determining the scope and value of the claimed damage for use by Chubb Lloyd's.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 12th day of October, 2017.

A handwritten signature in cursive script, appearing to read "Steve Kotara", is written above a horizontal line.

Steve Kotara